

SHER TREMONTE LLP

February 25, 2020

BY ECF

The Honorable Joan M. Azrack
United States District Judge
Eastern District of New York
200 Federal Plaza
Central Islip, NY 11722

Re: *United States v. Khwaja et al.*, 18 Crim. 607 (JMA)

Dear Judge Azrack:

We write on behalf of our client, Shikeba Rhamatzada, and on behalf of her co-defendant, Abdulrahman Khwaja, to respectfully request permission, pursuant to Rule IV.C of Your Honor's Individual Rules, for an expansion of the page limit for memoranda of law. We plan to file a joint omnibus motion on February 28 that will raise all of the pre-trial issues pertaining to our clients. There are numerous such issues that require the consideration of the Court—and that may significantly reduce the issues for trial—and it is impracticable to brief adequately all such issues in twenty-five pages. Accordingly, we respectfully request an expansion of the page limit for both defendants to file a joint brief of no more than fifty pages (though we anticipate filing a brief that is well short of that limit). We have no objection to an expansion of the page limit for the government's response.

We appreciate Your Honor's consideration.

Respectfully submitted,

/s/_____
Michael Tremonte
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Sher Tremonte LLP

Attorneys for Shikeba Rhamatzada

cc: All counsel (via ECF)